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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
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11 Donald Morisky,

2:21-CV-01301

12 Plaintiff,

13 v.

DEFENDANT'S STATUS REPORT

14 MMAS Research LLC, et al.,

15 Defendants.
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19 Status Report
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21 Defendants hereby submit their position on the status of the case for proceeding to trial.
22 Defendants attempted unsuccessfully to make a joint submission with Plaintiff.¹
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¹ Communication with Plaintiff's counsel were made to attempt a joint submission, but a timely resolution was not reached. Defendants hereby make this submission, understanding that Plaintiff will make one in parallel with differing views.

1. Defendants' Position on the Status of the Case

The case is presently ready for trial as the Court has previously ordered that it proceed to trial immediately and Defendants have prepared their case accordingly.

2. Defendants' Position on the Duration of the Trial

Three days.

3. Defendants' Motions

Defendants will file a Motion to Disqualify opposing counsel for conflict of interest by combining the roles of advocate and witness as prohibited under RPC 3.7 and ABA Rule 3.7: Lawyer as Witness.

Defendants will file Motions in Limine requesting that the Court limit the testimony to be provided by Plaintiff concerning the ownership of the Morisky Widget copyright and the status of the CR2A which was resolved by the 9th U.S. Circuit Court of Appeals on March 13, 2024.

Defendants have provided for these motions in the proposed schedule below.

3. Proposed Schedule for Pretrial Matters

Defendants believe that pretrial preparation may be accomplished in a period of no more than 90 days and propose the following schedule:

Event	Filed by Date
<u>Submission of Pretrial Motions:</u>	
General Motions	August 21, 2025
Motion for Disqualification of Counsel.....	August 21, 2025
Motions in Limine.....	August 25, 2025
Responses to Motions by all Parties.....	September 15, 2025
<u>Parties Pretrial Submissions:</u>	

Identification of Witnesses

Plaintiff.....August 18, 2025

Defendants.....August 21, 2025

Voir dire, jury instructions and exhibits..... October 6, 2025

Pretrial Conference..... To be set by the Court

Parties to be ready for Trial by.....October 27, 2025,

Respectfully submitted this 25th day of July 2025.

/s/ Patricia Ray
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